

ATTACHMENT A

INDICATOR	ted FFY 2006 APR response table FFY 2007 APR Information
Indicator 1: OSEP cannot determine whether noncompliance identified in FFY 2004 and	SC recalculated data for FFY 2004-FFY 2007 to allow accurate comparison of performance over time. Those data are included in the Indicator 1 section of the FFY 2007 APR.
FFY 2005 with the timely service provision requirements in 34 CFR §§303.340(c), 303.342(e) and 303.344(f)(1) was corrected. The State must report, in the FFY 2007 APR, due February 1, 2009, that this noncompliance was corrected in a timely manner, or if not corrected in a timely manner, when	SC has provided information about correction of noncompliance, and, if noncompliance not corrected, detailed information about efforts to current noncompliance and progress achieved. See ATTACHMENT B.
the noncompliance was corrected.	SC has described the factors contributing to noncompliance in the Indicator 1 section of the FFY 2007 APR.
	SC is actively working to improve performance related to timely service provision requirements in 34 CFR §§303.340(c), 303.342(e) and 303.344(f)(1). Improvement activities are included in the Indicator 1 section of the FFY 2007 APR and in ATTACHMENT B.
	 Revisions to the general supervision activities developed in FFY 2007 and implemented in FFY 2008 will allow SC to report status of progress in correction of previously reported noncompliance. See Indicator 9 section of the FFY 2007 APR.
The State must review its improvement activities and revise them, if appropriate, to ensure they will enable the State to provide data in the FFY 2007 APR, due February 1, 2009, demonstrating that the State is in compliance with the timely service provision requirements in 34 CFR §§303.340(c), 303.342(e) and 303.344(f)(1), including reporting correction of the noncompliance identified in the FFY 2006 APR.	Proposed revisions to Indicator 1 improvement activities are included in the in the Indicator 1 section of the FFY 2007 APR.
Indicator 7	SC recalculated data for FFY 2004-FFY 2007 to allow accurate comparison of
OSEP's June 15,2007 FFY 2005 SPP/APR response table required the State to include in the FFY 2006 APR, due February 1,2008, the data and information demonstrating correction of outstanding findings in Regions 2 and 6 regarding the comprehensive evaluation requirements in 34 CFR §303.322(a)(I) and (c)(3)(ii).	 performance over time. See Indicator 7 section of the FFY 2007 APR. SC has provided information about correction of noncompliance, and, if noncompliance not corrected, detailed information about efforts to current noncompliance and progress achieved. See ATTACHMENT B to the FFY 2007 APR.
The State provided no correction data regarding these regions or any other regions. The State must demonstrate, in the FFY 2007 APR, due February 1, 2009, that any uncorrected noncompliance from FFY 2005 was corrected.	Assuring consistent completion of comprehensive evaluations required statewide standardization procedures to be used within the BabyNet program. Effective August 1, 2006 all children served through BabyNet received a comprehensive evaluation prior to completion of initial IFSP and as part of



Summary of information related FFY 2006 APR response table				
INDICATOR	FFY 2007 APR Information			
	annual IFSP reviews.			
	Training, consultation and technical assistance regarding use of approved tools for conducting assessments and documenting results have been on going throughout FFY 2006 and FFY 2007.			
	Verification that every child served through BabyNet who has an IFSP has had an evaluation across the five required developmental domains is done through inter-agency record reviews and through intra-agency monitoring by all service coordinating agencies.			
	Improvement activities have been implemented sufficient to assure substantial compliance with the comprehensive evaluation requirement.			
	All previously identified noncompliance with this requirement has been corrected.			
The State must review its improvement activities and revise them, if appropriate, to ensure they will enable the State to provide data in the FFY 2007 APR, due February 1,2009, demonstrating that the State is in compliance with the 45-day time line requirements in 34 CFR §§303.321(e)(2), 303.322(e)(I), and 303.342, including reporting correction of the noncompliance identified in the FFY 2006 APR.	 Proposed revisions to SPP improvement activities are included in the FFY 2007 APR. 			
Indicator 8a	 SC recalculated data for FFY 2004-FFY 2007 to allow accurate comparison of performance over time. Those data are included in FFY 2007 APR. 			
OSEP could not determine whether noncompliance identified in FFY 2005 with the IFSP transition content requirements in 34 CFR §§303.148(b)(4) and 303.344(h) was corrected in a timely manner. The State must demonstrate, in the FFY 2007 APR, due February 1, 2009, that any FFY 2005 noncompliance was corrected in a timely manner, or if not corrected in a timely manner, when the noncompliance was corrected.	SC has provided information about correction of noncompliance, and, if noncompliance not corrected, detailed information about efforts to current noncompliance and progress achieved.			
	 The IFSP form was updated in 2006 to include specific sections on transition planning. The form was designed to prompt service coordinators to address transition planning. A copy of the updated form was submitted to OSEP for review at that time. 			
	 Training, consultation and technical assistance provided to regions, within service coordinating agencies and to local interagency coordination teams have emphasized need to initiate transition planning at the initial IFSP. 			



Summary of information relat	ed FFY 2006 APR response table
INDICATOR	FFY 2007 APR Information
The State must review its improvement activities and revise them, if appropriate, to ensure they will enable the State to provide data in the FFY 2007 APR, due February 1, 2009, demonstrating that the State is in compliance with the requirements in 34 CFR §§303.148(b)(4) and 303.344(h), including reporting correction of the noncompliance identified in the FFY 2006 APR.	 Proposed revisions to SPP improvement activities are included in the FFY 2007 APR.
Indicator 8c	SC recalculated data for FFY 2004-FFY 2007 to allow accurate comparison of
OSEP could not determine whether noncompliance identified in FFY 2005 with the timely transition conference requirements in 34 CFR	performance over time. Detailed information is included in the Indicator 8 section of the FFY 2007 APR.
§303.148(b)(2)(i) (as modified by IDEA section 637(a)(9» was corrected in a timely manner. The State must demonstrate, in the FFY 2007 APR, due February 1,2009, that this noncompliance was corrected in a timely manner, or if not corrected in a timely manner, when the noncompliance was corrected.	DHEC corrected BabyNet guidelines related to transition conferences to reflect the requirement for timely hand off of information from Part C to Part B no later than 90 days prior to the child's exit at age three. Service coordinators have been instructed to assure completion of transition conferences regardless of parent direct participation, although conferences involving all three parties are completed whenever possible.
	 Guidelines clarifying information to be exchanged between Part B and Part C (with appropriate consent) when the parent is interested in Part B services were issued statewide.
	 Written clarification related to LEA preferences for procedures to be used when school is not in session has been requested from each of the state's 84 LEAs
	 Every effort was made to develop meeting schedule to assure Part B participation in routine state-level program manager meetings.
	The DHEC BabyNet system manager and BabyNet regional consultants encouraged LEA participation in monthly local interagency coordination team meetings within each region. Meeting schedules in each region were adjusted to facilitate LEA participation. LEA participation in meetings or other communication with Part C staff has increased considerably by report of BabyNet regional consultants who attend all local interagency team meetings.
	 BabyTrac report was created to allow LEAs to track scheduling of transition conferences against previous transition notification (at 24 months) and referral (at 30 months).
	DHEC received consultation from OSEP technical assistance contractors.
	Joint meeting of SC Part B and Part C staff to discuss transition issues with OSEP state contacts completed as part of the OSEP verification visit.



Summary of information related FFY 2006 APR response table					
INDICATOR	FFY 2007 APR Information				
The State must review its improvement activities and revise them, if appropriate, to ensure they will enable the State to provide data in the FFY 2007 APR, due February 1,2009, demonstrating that the State is in compliance with the requirements in 34 CFR §303.148(b)(2)(i) (as modified by IDEA section 637(a)(9», including reporting correction of the noncompliance identified in the FFY 2006 APR.	 Proposed revisions to SPP improvement activities are included in the FFY 2007 APR. FFY 2007 APR (Attachment B) includes detailed information about correction of noncompliance, and, if noncompliance not corrected, detailed information about efforts to current noncompliance and progress achieved. 				
The State did not submit timely correction data and the State must provide the required data in the FFY 2007 APR, due February 1,2009.	FFY 2007 APR (Attachment B) includes detailed information about correction of noncompliance, and, if noncompliance not corrected, detailed information about efforts to current noncompliance and progress achieved.				
In responding to Indicators 1, 7, 8A, and 8C in the FFY 2007 APR, due February 1, 2009, the State must specifically identify and address the noncompliance identified in this table under those indicators.	FFY 2007 APR (Attachment B) includes detailed information about correction of noncompliance, and, if noncompliance not corrected, detailed information about efforts to current noncompliance and progress achieved.				

Reporting period: July 1, 2007-June 30, 2008



ATTACHMENT B

FFY 2008 Grant Award Special Condition Progress Report

II. Nature of the Special Conditions

Pursuant to these Special Conditions, the State must provide to OSEP by May 15, 2009 data demonstrating compliance with the requirements of 34 CFR §303.501(b). To document its progress in ensuring the timely correction of noncompliance, DHEC must submit:

1. Its first progress report with the State's FFY 2007 APR due by February 2, 2009, data through December 31, 2008 (in a list or chart format) on: (1) each EIS program monitored in FFYs 2004, 2005, 2006 and 2007 (from July 1, 2004 through July 30, 2008) and for the first half of FFY 2008 (from July 1, 2008 through December 31, 2008); (b) the number of findings of noncompliance that the State made as a result of such monitoring, disaggregating by topical Part C requirement, the area of those findings); (c) the number and percentage of those findings corrected within one year from identification; (d) for those findings not corrected, a description of DHEC's efforts to ensure compliance and the status of correction: and (e) all other efforts by DHEC to ensure compliance during the FFYs 2006 and 2007 reporting periods (such as data reviews, self-assessments, etc.).

ON-SITE	TABLE B-1a ON-SITE MONITORING VISITS CONDUCTED FFY 2004 – FFY 2007 FOR EACH DHEC DISTRICT/REGION						
YEAR Region* District* Visit Date YEAR Region* District Visit D							
FFY 2004	7	Trident	08/04	FFY 2006	6	Waccamaw	08/06
FFY 2004	4	PeeDee	11/04	FFY 2007	1	N/A	05/08
FFY 2004	3	Palmetto	02/05	FFY 2007	2	N/A	05/08
FFY 2004	5	Edisto-Savannah	05/05	FFY 2007	3	N/A	06/08
FFY 2005	4	Wateree	08/05	FFY 2007	8	N/A	03/08
FFY 2005	2	Appalachian III	08/05	FFY 2008		its replaced by s	
FFY 2005	2	Appalachian II	08/05		review of s	•	
FFY 2005	1	Upper Savannah	05/06		revised ge	neral supervisio APR (Indicator 9	n system in

(*NOTE: IN 2005 DHEC collapsed 12 named districts into 8 numbered regions.)

SOUTH CAROLINA Reporting period: July 1, 2007-June 30, 2008



SUMMARY of NONCOMPLIANCE FINDINGS AND CORRECTION FFY 2004 - FFY 2007

DHEC reviewed all reports of findings identified through monitoring visits conducted between July 1, 2004 and June 30, 2008 to eliminate all "findings" not directly related to noncompliance with IDEA Part C. This review was completed with guidance and assistance of OSEP consultants. Revised findings were based on the standards in TABLE B-1b.

TABLE B-1b	
Guidelines for October 2008 review of monitoring reports FFY 2004 - FFY 2008	,

dicator / quirement	Target	Definition of a "finding of noncompliance"	Standard for correction	on of findings
Timely services	100%	Documented evidence that all IFSP services were initiated within 30 days of IFSP completion in 12 of 15 records	No standards in place at time of monitoring.	
		reviewed.	Correction will be determined based or data system as outlined below, or, if	
Timely IFSP completion	100%	Documented evidence that IFSP completed within 45 days of referral date in 12 of 15 records reviewed	correction can't be docur the data system, through reviews.	mented through
Transition planning on IFSP	100%	Documented evidence of transition steps and services on IFSP in 12 of 15 records reviewed.	The protocols for the rec component of the BabyN supervision system will be	let general
Transition conference	100%	Documented evidence of completion of transition conference no later than 90 days before the child's third birthday in 12 of 15 records reviewed.	March 31, 2009. Reviews for services provided in FFY 2008 will be completed by September 2009.	
Comprehens ive evaluation	100%	Documented evidence comprehensive evaluations in five developmental domains in 12 of 15 records reviewed.	(See description of BabyNet general supervision plan in FFY 2007 APR Indicator 9)	
800				
			Standard for correction	on of findings
dicator / quirement	Target	Definition of a "finding of noncompliance"	Full correction*	Adequate progress*
Timely	100%	< 75% of eligible infants and toddlers with	100% any month;	≥ 85% over
services		provided within 30 days of IFSP completion*	≥ 95% any two months in 6-month period; or	6-month or 12-month period
		·	≥ 95% over 6- or 12- month period	•
Timely IFSP	100%	< 80% of eligible infants and toddlers with	100% any month;	≥ 80% over 6-
completion		assessment and an initial IFSP meeting were conducted within Part C's 45-day	≥ 95% any two months in 6-month period; or	or -12 month period
		timeline.	≥ 95% over 6- or 12- month period.	
	Timely IFSP completion Transition planning on IFSP Transition conference Comprehens ive evaluation 008 dicator / quirement Timely services	Timely IFSP 100% Comprehens ive evaluation dicator / quirement Timely IFSP Transition 100% Comprehens ive evaluation Transition 100% Transition 100% Transition 100% Transition 100% Transition 100% Transition 100% Timely IFSP 100%	Timely services Timely services Timely IFSP completion in 12 of 15 records reviewed. Timely IFSP completion Transition planning on IFSP Transition conference Toulet a complete side and in the side and in the services were initiated within 30 days of IFSP completed within 45 days of referral date in 12 of 15 records reviewed. Transition planning on IFSP Transition conference Toulet a complete a complete a completion of transition conference of completion of transition conference of completion of transition conference on later than 90 days before the child's third birthday in 12 of 15 records reviewed. Comprehens ive evaluation Target Timely IFSP completion Target Timely services Timely IFSP completion Timely IFSP completion	Timely services 100% Documented evidence that all IFSP services were initiated within 30 days of IFSP completion in 12 of 15 records reviewed. 100% Documented evidence that IFSP completion in 12 of 15 records reviewed. 100% Documented evidence that IFSP completion in 12 of 15 records reviewed. 100% Documented evidence that IFSP completed within 45 days of referral date in 12 of 15 records reviewed. 100% Documented evidence of transition steps and services on IFSP in 12 of 15 records reviewed. 100% Documented evidence of transition of transition conference on later than 90 days before the child's third birthday in 12 of 15 records reviewed. 100% Documented evidence comprehensive evaluations in five developmental domains in 12 of 15 records reviewed. 100% Documented evidence comprehensive evaluations in five developmental domains in 12 of 15 records reviewed. 100% Definition of a "finding of noncompliance" Full correction*

< 85% of all children exiting Part C with

transition conference (excluding those

exiting prior to third birthday).

(*July 1-Dec 31 or Jan 1-June 30)

Transition

conference

100%

8с

≥ 95% over 6-

or -12 month

period

100% any month;

in 6-month period ≥ 95% over 6- or 12month period

≥ 95% any two months



Reporting period: July 1, 2007-June 30, 2008

TABLE B-2 Summary of noncompliance findings and correction status FFY 2004-FFY 2008				
Year	# Monitoring visits	# Findings	# Findings corrected ≤ 1 year	% Findings corrected ≤ 1 year
FFY 2004	4	17	0	0%
FFY 2005	4	18	3	33%
FFY 2006	1	5	2	40%
FFY 2007	4	11	pending	pending
FFY 2008	*	5	pending	pending
TOTAL	13	56	pending	pending
* July 1-December 31. Findings based on data for entire state.				

TABLE B-3 Findings of noncompliance by topical area FFY 2004 (Based on 4 monitoring visits)					
# Findings % Findings Topical area # Findings corrected ≤ 1 year corrected ≤ 1 year					
Indicator 1 (Timely services)	3	0	0%		
Indicator 7 (IFSPs within 45 days)	2	0	0%		
Indicator 8a (Transition plan on IFSP)	4	0	0%		
Indicator 8c (Transition conference with LEA)	4	0	0%		
Other	4	0	0%		
TOTAL	17	0	0%		

Overview of DHEC actions to correct noncompliance identified in FFY 2004 and not corrected within 1 year

- These findings related to system issues requiring state level policy making to establish BabyNet program guidelines that will assure compliance with IDEA Part C requirements. Interagency work to develop comprehensive BabyNet system policy guidelines designed to assure compliance with all IDEA Part C requirements began in 2004 and was ongoing through implementation in August 2006. Until those guidelines were issued, district/regions did not have the tools to comply with all IDEA requirements. It was with that knowledge that the state entered into a Compliance Agreement with OSEP. As part of the that agreement, DHEC sent OSEP quarterly progress reports including monitoring findings, procedures for monitoring visits, data system information related to key compliance indicators.
- Corrective action plans developed by the local interagency coordination team for DHEC review and approval. DHEC tracked completion of corrective actions.
- Monthly review of number of late events (service initiation, IFSP completion, transition notification, transition conference) and quarterly report of this data to OSEP.
- Training, consultation and technical assistance to local interagency coordination teams by DHEC contractors, with guidance and assistance of OSEP consultants as needed.

Reporting period: July 1, 2007-June 30, 2008



TABLE B-4 Findings of noncompliance by topical area FFY 2005 (Based on 4 monitoring visits)						
# Findings % Findings Topical area # Findings corrected ≤ 1 year corrected ≤ 1 year						
Indicator 1 (Timely services)	3	0	0%			
Indicator 7 (IFSPs within 45 days)	4	0	0%			
Indicator 8a (Transition plan on IFSP)	3	2	67%			
Indicator 8c (Transition conference with LEA)	4	0	0%			
Other	4	2	50%			
TOTAL	18	4	22%			

Overview of DHEC actions to correct noncompliance identified in FFY 2005 and not corrected within 1 year

- On-going interagency work to develop comprehensive BabyNet system policy guidelines designed to assure compliance with all IDEA Part C requirements. Quarterly progress reports to OSEP.
- Continuing quarterly interagency on-site reviews to identify noncompliance and to assess status of program implementation. This information was used to inform policy making process as policy manual was being developed.
- Review, approval and tracking activities included in required corrective action plans.
- Monthly review of number of late events (service initiation, IFSP completion, transition notification, transition conference) and quarterly report of this data to OSEP.
- Training, consultation and technical assistance to local interagency coordination teams by DHEC contractors with assistance of OSEP consultants. TA provided based on data review.
- Creation of additional DHEC regional consultant positions to serve as lead agency contact within each DHEC administrative region.
- Completion and implementation of comprehensive policy and procedure manual.

Reporting period: July 1, 2007-June 30, 2008



TABLE B-5 Findings of noncompliance by topical area FFY 2006 (Based on 1 monitoring visit)						
# Findings % Findings Topical area # Findings corrected ≤ 1 year corrected ≤ 1 year						
Indicator 1 (Timely services)	1	0	0%			
Indicator 7 (IFSPs within 45 days)	1	0	0%			
Indicator 8a (Transition plan on IFSP)	1	1	100%			
Indicator 8c (Transition conference with LEA)	1	0	0%			
Other (comprehensive evaluation)	1	1	100%			
TOTAL	5	2	40%			

Overview of DHEC actions to correct noncompliance identified in FFY 2006 and not corrected within 1 year

- Continuing quarterly interagency on-site reviews to identify noncompliance and to assess status of program implementation. This information was used to inform policy making process as policy manual was being developed.
- Review, approval and tracking activities included in required corrective action plans.
- Monthly review of number of late events (service initiation, IFSP completion, transition notification, transition conference) and quarterly report of this data to OSEP.
- Training, consultation and technical assistance to local interagency coordination teams by DHEC contractors with assistance of OSEP consultants. TA provided based on data review.
- Creation of additional DHEC regional consultant positions to serve as lead agency contact within each DHEC administrative region.
- Completion and implementation of comprehensive policy and procedure manual.
- On-going revision and update of data system to facilitate data entry.
- Data system changes to allow point of service data entry by all service coordinators. Associated training provided statewide.
- Increased provider recruitment and retention activities with new DHEC BabyNet positions.
- BabyNet system manager monthly transition notification reports generated and sent to contacts at each LEA.
- Noncompliance related to transition notification was corrected statewide with July 2007 implementation of system for monthly reporting by DHEC BabyNet system manager for all children within assigned DHEC area.

Reporting period: July 1, 2007-June 30, 2008



TABLE B-6 Findings of noncompliance by topical area FFY 2007 (Based on 4 monitoring visits)					
# Findings % Findings Topical area # Findings corrected ≤ 1 year corrected ≤ 1 year					
Indicator 1 (Timely services)	4	Pending	Pending		
Indicator 7 (IFSPs within 45 days)	1	1	100%		
Indicator 8a (Transition plan on IFSP)	3	Pending	Pending		
Indicator 8c (Transition conference with LEA)	3	Pending	Pending		
TOTAL	11	Pending	Pending		

Overview of DHEC actions to correct noncompliance identified in FFY 2007.

- Correction pending. One year has not elapsed since notification. Additional detailed information will be submitted to OSEP by May 15, 2009 in response to conditions placed on FFY 2008 grant award.
- Improvement activities as listed in FFY 2007 APR.

TABLE B-7 Findings of noncompliance by topical area FFY 2008 (Based on statewide data July 1 – December 31, 2008)			
Topical area	# Findings	# Findings corrected ≤ 1 year	% Findings corrected ≤ 1 year
Indicator 1 (Timely services)	2	N/A	N/A
Indicator 7 (IFSPs within 45 days)	0	N/A	N/A
Indicator 8a (Transition plan on IFSP)	0	N/A	N/A
Indicator 8c (Transition conference with LEA)	3	N/A	N/A
TOTAL	5		

Overview of DHEC actions to correct noncompliance identified in FFY 2008.

- Correction pending. One year has not elapsed since notification. Additional detailed information will be submitted to OSEP by May 15, 2009 in response to conditions placed on FFY 2008 grant award.
- Improvement activities as listed in FFY 2007 APR.

All other DHEC efforts in FFY 2006 and FFY 2007 to assure compliance with IDEA Part C requirements.

As described in the FFY 2007 APR for Indicators 1-9.